

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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In re Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

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This Document Relates to All Actions

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**DECLARATION OF GENEVIEVE M. ZIMMERMAN**

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbeshier & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. Attached hereto as Exhibit 1 is a true and correct copy of an email confirming receipt of Production 48.
3. Attached hereto as Exhibit 2 is a true and correct copy of a letter from Genevieve Zimmerman of Plaintiffs' Counsel to Benjamin Hulse of Blackwell Burke, dated October 24, 2018.
4. Attached hereto as Exhibit 3 is a true and correct copy of a letter from Gabriel Assaad of Plaintiffs' Counsel to Defendants' Counsel, dated November 20, 2018.
5. Attached hereto as Exhibit 4 is a true and correct copy of a letter from Kyle Farrar of Plaintiffs' Counsel to Benjamin Hulse at Blackwell Burke, dated November 29, 2018.
6. Attached hereto as Exhibit 5 is a true and correct copy of a letter from Gabriel Assaad of Plaintiffs' Counsel to Defendants' Counsel, dated November 30, 2018.

7. Attached hereto as Exhibit 6 is a true and correct copy of a letter from Benjamin Hulse of Blackwell Burke to Gabriel Assaad of Plaintiffs' Counsel, dated November 30, 2018.
8. Attached hereto as Exhibit 7 is a true and correct copy of a letter from Benjamin Hulse of Blackwell Burke to Gabriel Assaad of Plaintiffs' Counsel, dated December 7, 2018.
9. Attached hereto as Exhibit 8 is a true and correct copy of portions from Dr. Daniel Sessler's deposition, taken on January 11, 2017.
10. Attached hereto as Exhibit 9 is a true and correct copy of Document bearing Bates Number 3MBH00047382.
11. Attached hereto as Exhibit 10 is a true and correct copy of Document bearing Bates Number 3MBH01897094.
12. Attached hereto as Exhibit 11 is a true and correct copy of portions from Gary Hansen's deposition, taken on November 2, 2016.
13. Attached hereto as Exhibit 12 is a true and correct copy of Document bearing Bates Number 3MBH00022367.
14. Attached hereto as Exhibit 13 is a true and correct copy of Document bearing Bates Number 3MBH01031246.
15. Attached hereto as Exhibit 14 is a true and correct copy of Document bearing Bates Number 3MBH00018311.
16. Attached hereto as Exhibit 15 is a true and correct copy of Document bearing Bates Number 3MBH00048067.
17. Attached hereto as Exhibit 16 is a true and correct copy of Document bearing Bates Number 3MBH00107862.
18. Attached hereto as Exhibit 17 is a true and correct copy of Document bearing Bates Number 3MBH00126140.

19. Attached hereto as Exhibit 18 is a true and correct copy of Document bearing Bates Number 3MBH00132832.
20. Attached hereto as Exhibit 19 is a true and correct copy of Document bearing Bates Number 3MBH00008025.
21. Attached hereto as Exhibit 20 is a true and correct copy of Document bearing Bates Number 3MBH00018429.
22. Attached hereto as Exhibit 21 is a true and correct copy of Document bearing Bates Number 3MBH00025739.
23. Attached hereto as Exhibit 22 is a true and correct copy of Document bearing Bates Number 3MBH00008941.
24. Attached hereto as Exhibit 23 is a true and correct copy of Document bearing Bates Number 3MBH0024592.
25. Attached hereto as Exhibit 24 is a true and correct copy of Document bearing Bates Number 3MBH00002647.
26. Attached hereto as Exhibit 25 is a true and correct copy of Document bearing Bates Number 3MBH00024633.
27. Attached hereto as Exhibit 26 is a true and correct copy of Document bearing Bates Number 3MBH00024678.
28. Attached hereto as Exhibit 27 is a true and correct copy of Document bearing Bates Number 3MBH00545125.
29. Attached hereto as Exhibit 28 is a true and correct copy of Document bearing Bates Number 3MBH00022625.
30. Attached hereto as Exhibit 29 is a true and correct copy of Document bearing Bates Number 3MBH00022877.

31. Attached hereto as Exhibit 30 is a true and correct copy of Document bearing Bates Number 3MBH00031184.
32. Attached hereto as Exhibit 31 is a true and correct copy of portions from Teri Woodwick-Sides deposition, taken on December 8, 2016.
33. Attached hereto as Exhibit 32 is a true and correct copy of Document bearing Bates Number 3MBH00005575.
34. Attached hereto as Exhibit 33 is a true and correct copy of Document bearing Bates Number 3MBH00052987.
35. Attached hereto as Exhibit 34 is a true and correct copy of Document bearing Bates Number 3MBH00053468.
36. Attached hereto as Exhibit 35 is a true and correct copy of Document bearing Bates Number 3MBH00109033.
37. Attached hereto as Exhibit 36 is a true and correct copy of Document bearing Bates Number 3MBH00580475.
38. Attached hereto as Exhibit 37 is a true and correct copy of portions from Dr. Paul McGovern's deposition, taken on January 5, 2017.
39. Attached hereto as Exhibit 38 is a true and correct copy of portions from Michael Reed's deposition, taken on December 4, 2016.
40. Attached hereto as Exhibit 39 is a true and correct copy of portions from Dr. Christopher Nachtsheim's deposition, taken on November 29, 2016.
41. Attached hereto as Exhibit 40 is a true and correct copy of Document bearing Bates Number 3MBH00001557.
42. Attached hereto as Exhibit 41 is a true and correct copy of Document bearing Bates Number 3MBH00050756.

43. Attached hereto as Exhibit 42 is a true and correct copy of Document bearing Bates Number 3MBH00024809.
44. Attached hereto as Exhibit 43 is a true and correct copy of Document bearing Bates Number 3MBH01224622.
45. Attached hereto as Exhibit 44 is a true and correct copy of Document bearing Bates Number 3MBH00130429.
46. Attached hereto as Exhibit 45 is a true and correct copy of Document bearing Bates Number 3MBH00083780.
47. Attached hereto as Exhibit 46 is a true and correct copy of Document bearing Bates Number 3MBH01211442.
48. Attached hereto as Exhibit 47 is a true and correct copy of Document bearing Bates Number 3MBH00051252.
49. Attached hereto as Exhibit 48 is a true and correct copy of Document bearing Bates Number 3MBH00575107.
50. Attached hereto as Exhibit 49 is a true and correct copy of Document bearing Bates Number 3MBH00575251.
51. Attached hereto as Exhibit 50 is a true and correct copy of Document bearing Bates Number 3MBH00132501.
52. Attached hereto as Exhibit 51 is a true and correct copy of Document bearing Bates Number 3MBH01619270.
53. Attached hereto as Exhibit 52 is a true and correct copy of Document bearing Bates Number 3MBH00555876.
54. Attached hereto as Exhibit 53 is a true and correct copy of Document bearing Bates Number 3MBH00134035.

55. Attached hereto as Exhibit 54 is a true and correct copy of Document bearing Bates Number 3MBH00107719.

56. Attached hereto as Exhibit 55 is a true and correct copy of portions from Dr. Andrea Kurz deposition, taken on January 12, 2017.

57. Attached hereto as Exhibit 56 is a true and correct copy of VitaHeat Product Information.

58. Attached hereto as Exhibit 57 is a true and correct copy of the Draft CDC HICPAC Meeting Minutes.

59. Attached hereto as Exhibit 58 is a true and correct copy of the RIIiO Trial Study.

Dated: December 28, 2018

/s/ Genevieve M. Zimmerman

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**Plaintiffs Co-Lead Counsel**